Joseph J. Vitale (JV-0415) COHEN, WEISS AND SIMON LLP 330 West 42<sup>nd</sup> Street New York, New York 10036 (212) 563-4100

Counsel for International Union, United Automobile, Aerospace and Agricultural Implement Workers of America (UAW)

## UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

| In re:                      | ) |                        |
|-----------------------------|---|------------------------|
|                             | ) | Chapter 11             |
| DELPHI CORPORATION, et al., | ) |                        |
|                             | ) | 05-44481 (RDD)         |
| Debtors.                    | ) | (Jointly Administered) |

## MOTION UNDER LOCAL BANKRUPTCY RULE 2090-1(b) FOR ADMISSION PRO HAC VICE

1. Joseph J. Vitale ("Movant"), a member in good standing of the Bar of the State of New York, an attorney admitted into practice before the United States Bankruptcy Court for the Southern District of New York, and a partner of Cohen, Weiss and Simon LLP, hereby submits this motion (the "Motion") to this Court for an order permitting Niraj R. Ganatra to practice *pro hac vice* before the United States Bankruptcy Court for the Southern District of New York to appear and represent International Union, United Automobile, Aerospace and Agricultural Implement Workers of America (UAW), which is a creditor and party in interest in this proceeding, under Rule 2090-1(b) of the Local Bankruptcy Rules of the Southern District of New York (the "Local Rules"). In support of the Motion, the Movant states as follows:

- 2. Mr. Ganatra is an associate general counsel for the UAW and has appeared as counsel for the UAW in numerous Chapter 11 cases across the United States. Based on the annexed certification, Mr. Ganatra is admitted, practicing, and in good standing, as a member of the bars of the State of Michigan as well as the United States District Court for the Eastern and Western Districts of Michigan. There are no disciplinary proceedings pending against Mr. Ganatra.
- 3. Mr. Ganatra's address is International Union, UAW, 8000 East Jefferson Avenue, Detroit, MI 48214; his email is nganatra@uaw.net and his telephone is (313) 926-5216.
- 4. Mr. Ganatra agrees to pay the fee of \$25.00 upon approval by this Court admitting him to practice *pro hac vice*.
- 5. The Movant requests that this Court allow this Motion so that Mr. Ganatra may file pleadings and appear and be heard at hearings in these Chapter 11 cases.
- 6. Pursuant to the annexed certificate, Mr. Ganatra submits to the disciplinary jurisdiction of this Court for any alleged misconduct that occurs in the course, or the preparation, of these cases. In addition, as indicated on the certificate, Mr. Ganatra has acquired or has access to a copy of the Local Bankruptcy Rules and is generally familiar with such rules.

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WHEREFORE, the Movant respectfully requests that this Court enter an order permitting Mr. Ganatra to appear *pro hac vice* in association with the Movant as counsel for the UAW in these Chapter 11 cases.

Dated: October 13, 2005

New York, New York

COHEN, WEISS, AND SIMON LLP

By:

Joseph J. Vitale (JV-0415)

330 West 42nd Street

New York, New York 10036

(212) 563-4100

Counsel for International Union, United Automobile, Aerospace and Agricultural Implement Workers of America (UAW)

## **CERTIFICATE**

The undersigned certifies that he is eligible for admission to this Court, is admitted to practice, and is in good standing in the jurisdictions set forth in the Motion, submits to the disciplinary jurisdiction of the Court for any alleged misconduct that arises in the course, or the preparation of, these chapter 11 cases pursuant to Local Bankruptcy Rules for the Southern District of New York, and has acquired or has access to a copy of such rules and is generally familiar with such rules.

Dated: October 13, 2005

Niraj R. Ganatra

International Union, UAW 8000 East Jefferson Avenue

Detroit, MI 48214

## UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

| In re:   | )             |                                       |  |  |
|--|---------------|---------------------------------------|--|--|
| DELDIH CODDOD ATION 14 -1  | )             | Chapter 11                            |  |  |
| DELPHI CORPORATION, et al.,  | )             | 05-44481 (RDD)                        |  |  |
| Debtors.   | )             | (Jointly Administered)                |  |  |
| ORDER UNDER LOCAL BANKRUPTCY RULE 2090-1(b) GRANTING ADMISSION PRO HAC VICE TO NIRAJ GANATRA |               |                                       |  |  |
| Upon the motion of Joseph J. Vitale  | e dated Oc    | tober 13, 2005 for the admission of   |  |  |
| Niraj R. Ganatra pro hac vice in this bankruptcy ca  | ase, it is he | ereby                                 |  |  |
| ORDERED, that Niraj R. Ganatra,  | Esq., is a    | dmitted to practice, pro hac vice, in |  |  |
| the above referenced bankruptcy case, in the Unite   | d States B    | Bankruptcy Court, Southern District   |  |  |
| of New York, subject to the payment of the filing to   | fee.          |                                       |  |  |
|  |               |                                       |  |  |
| Dated: October, 2005   | -             |                                       |  |  |
|  | 1             | United States Bankruptcy Judge        |  |  |